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April 25, 2023

Via ECF

Hon. Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Plaintiff's Letter Motion for Sanctions regarding
Defendants' Failure to Provide Compelled Text Messages**
Stidham v. 161-10 Hillside Auto Ave, LLC, No. 21-cv-07163 (PKC) (RLM), (E.D.N.Y.)

Dear Judge Bloom:

We respectfully write to report that we have not yet received the text messages subject to the Order to Compel issued by the Court on April 3, 2023. In the Order, the Court stated, in relevant part, as follows: "Plaintiff's motion to compel text messages between parties that pertain to plaintiff or to pregnancy discrimination is granted. Any text messages responsive to plaintiff's second set of document requests, request nos. 3-6 [ECF No. 58-3 at 11], and third set of document requests, request nos. 3-6, 8 [ECF No. 58-4 at 11], shall be produced by April 23, 2023. This is a Court Order and defendants must comply. Defendants are warned that if they fail to comply with this Order, the Court may hold them in contempt pursuant to Fed. R. Civ. P. 45(g). A person found to be in contempt is subject to sanctions, which may include a monetary fine, attorney's fees, costs, and even imprisonment." To date, we have received no response from Defendants.

Defendants' counsel has previously claimed that he "misread" the Court's Order with respect to the sales logs and that this only came to defendants' counsel's attention "due to plaintiff's email." As this was part of that same April 3, 2023 order, we respectfully request this failure to respond to the Court's order be addressed in Plaintiff's in-person Motion for Sanctions hearing on May 4, 2023 at 10 a.m. We thank the Court for its prompt and kind attention to this matter.

Respectfully Submitted,
/s/ Tiffany Troy
Tiffany Troy
Attorney for Plaintiffs

JT/mh
cc.: (via ECF)